

**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION**

ANDREEA IACOBETI

Plaintiff,

v.

GENNA LEIGH ROSE WEEKS

Defendant.

Case Number: 1:23-CV-1758

Judge: Adam B Abelson

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**PLAINTIFF'S SUPPLEMENT IN FURTHER OPPOSITION TO  
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

Plaintiff, Andreea Iacobet, by her attorney, William C. Hudson, in further opposition to Defendant's Motion for Summary Judgment, states as follows:

1. Counsel for Plaintiff recently learned of three eyewitnesses to the incident who were not identified in the accident report and other materials earlier provided by the Ocean City Police Department.
2. The eyewitnesses are Jacob Ginsberg, Kevin Wertlieb and Leo Gueriguian.
3. The affidavits of the eyewitnesses are attached hereto as Exhibits C, D and E.
4. Each affidavit confirms Defendant did not slow down, did not proceed with caution when a flashing yellow light was displayed and other vehicles were stopped at a marked crosswalk for pedestrians, overtook at least three vehicles stopped at the marked crosswalk for pedestrians and failed to yield to a pedestrian and cyclist in a marked crosswalk.
5. Each affidavit further confirms that at all times during the crossing and until struck by Defendant, Plaintiff and the cyclist appeared to be in the marked crosswalk and to be moving at a steady and deliberate pace and that neither of them darted out into traffic or did anything the witnesses considered to be sudden, erratic or unpredictable.

6. Based on those affidavits and the contents of Plaintiff's initial Opposition and supporting exhibits, Defendant's Motion should be denied.

Respectfully submitted,

/s/ William C. Hudson

William C. Hudson, Esquire  
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Counsel for Plaintiff

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 3<sup>rd</sup> day of April 2024, the foregoing Plaintiff's Supplemental Opposition to Defendant's Motion for Summary Judgment and supporting Exhibits C, D and E were filed and served via the Court's CM/ECF system on Anne K. Howard, Esquire, and David H. Fleishman, Esquire, Twinbrook Metro Plaza, 12300 Twinbrook Parkway, Suite 540, Rockville, Maryland 20852, counsel for Defendant Genna Leigh Rose Weeks.

/s/ William C. Hudson

Counsel for Plaintiff